

1 WILMER CUTLER PICKERING
2 HALE AND DORR LLP

3 SONAL N. MEHTA (SBN 222086)
4 Sonal.Mehta@wilmerhale.com
5 2600 El Camino Real, Suite 400
6 Palo Alto, California 94306
7 Telephone: (650) 858-6000
8 Facsimile: (650) 858-6100

9 DAVID Z. GRINGER (*pro hac vice*)
10 David.Gringer@wilmerhale.com
11 7 World Trade Center
12 250 Greenwich Street
13 New York, New York 10007
14 Telephone: (212) 230-8800
15 Facsimile: (212) 230-8888

16 ARI HOLTZBLATT (*pro hac vice*)
17 Ari.Holtzblatt@wilmerhale.com
18 MOLLY M. JENNINGS (*pro hac vice*)
19 Molly.Jennings@wilmerhale.com
20 1875 Pennsylvania Avenue, NW
21 Washington, DC 20006
22 Telephone: (202) 663-6000
23 Facsimile: (202) 663-6363

24 *Attorneys for Defendant Meta Platforms, Inc.*

25
26
27
28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

21 MAXIMILIAN KLEIN, et al.,
22
23 Plaintiffs,
24
25 v.
26 META PLATFORMS, INC., a Delaware
27 corporation,
28 Defendant.

Case No. 3:20-cv-08570-JD

**DEFENDANT'S ADMINISTRATIVE
MOTION TO CONSIDER
WHETHER ANOTHER PARTY'S
MATERIAL SHOULD BE SEALED**

Judge: Hon. James Donato

Pursuant to Civil Local Rule 79-5(f), Defendant Meta Platforms, Inc. files this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed. In particular, certain documents and information referenced in the concurrently filed Letter Brief have been designated by non-party Alpha Exploration Co. Inc., *d/b/a/* Clubhouse, as "Highly Confidential" under the Stipulated Protective Order (Dkt. 111).

Portions of the Letter Brief referencing or reflecting the contents of the designated-as-confidential information have been redacted from the publicly filed version of the Letter Brief, and an unredacted version of the Letter Brief with the confidentially designated portions highlighted is filed with this Administrative Motion. *See* Civ. L. R. 79-5(e).

Defendant respectfully requests that the Court grant its motion to consider whether the above-referenced Clubhouse material should be sealed.

Dated: September 2, 2022

Respectfully submitted,

By: /s/ Sonal N. Mehta
 SONAL N. MEHTA (SBN 222086)
 sonal.mehta@wilmerhale.com
 WILMER CUTLER PICKERING HALE
 AND DORR LLP
 2600 El Camino Real, Suite 400
 Palo Alto, CA 94306
 Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
 david.gringer@wilmerhale.com
 WILMER CUTLER PICKERING HALE
 AND DORR LLP
 7 World Trade Center
 250 Greenwich Street
 New York, New York 10007
 Telephone: (212) 230-8800

ARI HOLTZBLATT (*pro hac vice*)
ari.holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
molly.jennings@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 663-6000

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September, 2022, I transmitted the foregoing document to the Clerk's Office using the CM/ECF System, and to counsel for Alpha Exploration Co., Inc., d/b/a Clubhouse via Federal Express Overnight Mail.

/s/ Sonal N. Mehta

Sonal N. Mehta